

IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF MISSISSIPPI  
Jackson Division

MISSISSIPPI ASSOCIATION OF )  
EDUCATORS, BARBARA PHILLIPS, )  
JAMES THOMAS, DAWN ZIMMERER, ) Civil No. \_\_\_\_\_  
L.E. JIBOL, UNITED CAMPUS WORKERS )  
SOUTHEAST LOCAL 3821, MADISYN )  
DONLEY, ALEXIS COBBS, KAREN )  
ADERER, FOSTERING LGBTQ+ )  
ADVOCACY, RESOURCES, )  
ENVIRONMENTS AND WOMEN IN )  
SCIENCE AND ENGINEERING, )  
)

*Plaintiffs,*

v.

BOARD OF TRUSTEES OF STATE  
INSTITUTIONS OF HIGHER LEARNING,  
MISSISSIPPI COMMUNITY COLLEGE  
BOARD, MISSISSIPPI STATE BOARD OF  
EDUCATION, MISSISSIPPI CHARTER  
SCHOOL AUTHORIZER BOARD,

*Defendants.*

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**DECLARATION OF LAURA MAMMINA**

Pursuant to 28 U.S.C. § 1746, I, Laura Mammina, make the following declaration under penalty of perjury:


1. My name is Laura Mammina. My place of residence is Hattiesburg, Mississippi. I have been a resident of Forrest County and the state of Mississippi for thirteen months.
2. I am an Assistant Professor of History affiliated with the University of Southern Mississippi where I have been teaching since August 2024. I earned a B.A. in History from the University of Washington, and an M.A. and PhD in History from the University of Alabama. Prior to working at the University of Southern Mississippi I was an Assistant Professor of History at the University of Houston, Victoria for six years.

3. Many of the concepts banned by HB 1193 are essential to my job, my research, my academic freedom, and the exercise of my rights to free speech as part of my job in regards to both instruction and in-class discussions. I want to continue doing my job as before.
4. My work is impacted by the following sections of HB 1193: 3(b), 3(i), 3(f), 3(g). The focus of my research and teaching is 19<sup>th</sup> Century U.S. history, specifically African American history and the history of gender and sexuality. I would be unable to teach my courses as normal under HB 1193's prohibitions and would need to avoid many subjects all together to comply with the law. My research and teaching necessarily focus on racism and sexism in the U.S. in the 19<sup>th</sup> Century U.S. and raise awareness or understanding of issues related to race, sex, color, gender identity, sexual orientation, and national origin.
5. I was scheduled to teach the course "History 101: World Civilization to 1500" in the Fall 2025 semester but I am no longer teaching that class as I believe many of the concepts I will teach in that course would violate HB 1193. Specifically, in that course I teach about: 1) how many modern conceptions of race did not develop until after the time period studied; 2) the specific challenges faced by female pharaohs in Ancient Egypt on account of their sex; 3) Aristophanes' stories about androgynous humans in Plato's *The Symposium*; and 4) same-sex relations in Ancient Greece and Ancient Rome. Discussion of those concepts of race, sex, and gender identity violate 3(b), 3(i), and 3(h). I also require participation in class discussion on all topics in that course, including those listed above, which could violate 3(g).
6. In the Fall of 2025 I am also scheduled to teach "The Sectional Conflict and the Civil War". In that class I teach about the central role slavery played in American Civil War which would violate 3(b), 3(i), and 3(h). I also teach primary sources, such as Mississippi's "Declaration of Causes" for secession which expressly includes the State's endorsement of the concept white racial superiority, a divisive concept the engagement with which is prohibited by 3(b). Attendance in this course is mandatory, possibly violating 3(g).

7. In previous courses I have taught at the University of Southern Mississippi I have had several students who have expressed a preference that they be referred to using gender neutral pronouns. By agreeing to use such pronouns I would be violating 3(f) by endorsing the concept of gender-neutral pronouns.
8. I am afraid that by teaching and interacting in the classroom, I will face consequences such as complaints from students or others that my instruction or discussion violate HB 1193 and which could result in my suffering penalties under the law. If my school loses all state funding, I will lose my employment.
9. Students will receive an inferior education as a result of the law, which prevents them from discussing and learning about much of history.
10. Many provisions of the law are so broad and vague that it is unclear what I can and cannot say in my efforts to remain in compliance with the law.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed: June 19, 2025

  
\_\_\_\_\_  
{ WITNESS }